

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

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PRISONER CIVIL RIGHTS COMPLAINT
42 U.S.C. § 1983

DEMANDA POR VIOLACION A DERECHOS CIVILES DE CONFINADO
42 U.S.C. § 1983

Javier J. Acevedo Rodriguez

Full name of plaintiff

Nombre completo del demandante

24-CV-1139
CVR

v.

José Luis Cuevas Ramos and Carmen
Ramona Natal Perez, Edgardo Luis
Cuevas Natal and Magda Quintana

Full name(s) of defendant(s)

nombre completo de(l)(los) demandado(s)

I. Previous lawsuits.
Pleitos radicados anteriormente.

A. Have you brought other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to your imprisonment?

¿Ha iniciado usted otros pleitos en los tribunales estatales o federales que tengan que ver con los mismos hechos de la presente acción o que se relacionen con su reclusión?

(✓) Yes (Sí)

() No

B. If your answer to "A" is yes, describe the lawsuit in the space below. If there is more than one lawsuit, describe the additional lawsuits on another piece of paper using the same outline.

Si la contestación a la pregunta "A" es en la afirmativa, describa el pleito en el espacio siguiente. De existir más de un pleito, descríbalos en otro papel

utilizando el mismo modelo.

1. Parties to the previous lawsuit.
Partes en el pleito anterior.

Plaintiff(s)

Demandante(s)

Javier J. Acevedo Rodriguez

Defendant(s)

Demandado(s)

Edgardo Luis Cuevas Urdal, Magda
Quintana y José Luis Cuevas Ramos y Carmen Raimunda
Urdal Perez.

2. Court. If federal court, name the district, if state court, name the county or part.

Tribunal. Si es un tribunal federal, indique el distrito, si es un tribunal estatal, indique el condado o sala.

United States District Court, San Juan, P.R.
00918-1767.

3. Docket number.

Número asignado.

3:23-CV-01407-RAM

4. Name of judge to whom the case is assigned.

Nombre del juez a quien se le asignó el caso.

Raul M. Arias Marxuach

5. Disposition. For example: Was the case dismissed? Was it appealed? Is it still pending?

Disposición. Por ejemplo: ¿Se desestimó el caso? ¿Se apeló? ¿Se encuentra aún pendiente?

Dismissing without prejudice

6. Approximate date of filing lawsuit.

Fecha aproximada en que radicó el pleito.

August 16, 2023.

7. Approximate date of disposition.
Fecha aproximada en que se resolvió el pleito.

11/19/2024.

II. Place of confinement.
Lugar actual de reclusión.

- A. Is there a prisoner's grievance procedure in the institution?
¿Existe un procedimiento de quejas y agravios para los confinados en la institución?

(☒) Yes (Sí) () No

- B. Did you present the facts related to your complaint in the state prisoner's grievance procedure?
¿Presentó usted los hechos de su querrella bajo el procedimiento de quejas y agravios para confinados?

() Yes (Sí) (☒) No

- C. If your answer is yes,
Si su contestación es afirmativa,

1. What steps did you take?
¿Qué medidas tomó usted?

N/A
N/A

2. What was the result?
¿Cuál fue el resultado?

N/A
N/A

- D. If your answer is No, explain why not.
Si su contestación es No, explique porqué.

Because the facts are not related
to the Institution Ponce 1,000 Adv/Hab.

E. If there is no prison grievance procedure in the institution, did you complain to prison authorities?

Si no existe un procedimiento de quejas y agravios en la institución, ¿se quejó usted con las autoridades de la institución?

() Yes (Sí)

(✓) No

F. If your answer is Yes,
Si su contestación es en la afirmativa,

1. What steps did you take?
¿Qué medidas tomó usted?

MA
MA

2. What was the result?
¿Cuál fue el resultado?

MA
MA

III. Parties.
Partes.

In item A below, write your name in the first blank and write your present address in the second blank. Do the same for additional parties, if any, using the reverse side if necessary.

Bajo la letra A, escriba su nombre en la primera línea y su dirección actual en la segunda línea. Si hay demandantes adicionales, provea la misma información utilizando el dorso si es necesario.

A. Name of plaintiff

Nombre del demandante Javier J. Acevedo Rodríguez

Address
Dirección

Instituto Ponce 1,000 Adultos
Modelo 4Q - Celda # 110, 3699
Ponce by Pass, Ponce, P.R. 00728-
1504

In item B below, write the full name of the defendant in the first blank, his official position in the second blank, and his place of employment in the third blank. Use item C for the name, position and place of employment of any additional defendant.

Bajo la letra B, escriba en la primera línea el nombre completo del demandado, en la segunda línea escriba el puesto que ocupa y en la tercera línea escriba el lugar donde está empleado. Utilice el apartado C para escribir el nombre, puesto y lugar de empleo de otro demandado.

B. Defendant
Demandado

is employed as
está empleado como

at
en

Edgardo Luis Cuevas Nata, Magda
Quintana, José Luis Cuevas Ramos
y Carmen Ramona Natal Perez

MA
MA

IV. Statement of Claim.
Relación de Hechos.

State here, as briefly as possible, the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates or statutes. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach an extra sheet if necessary.

Escriba brevemente los hechos del caso. Describa la participación de cada uno de los demandados. Incluya también los nombres de otras personas que tuvieron participación, las fechas y los estatutos. No presente argumentos legales ni cite precedentes ni estatutos. Si usted quiere presentar varias reclamaciones, enumérelas y hágalo en párrafos por separado. Puede utilizar otra hoja de papel si lo considera necesario.

Due to the facts that happened in the day of
30 September of 2019. In which the defendants
here Mr. José Luis Cuevas Ramos and his wife
Carmen Ramona Natal Perez fraudulently
sold plaintiff home and fraudulently took
all the goods (private properties) and

Community properties of the plaintiff
that includes the business with the name of
laboratorios Clinicos Nuzary Inc. Creating →
(continue on page 2, 3 and 4
of the part IV).

V. Request for Relief.
Solicitud de Remedio.

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

Indique brevemente lo que usted espera que el tribunal haga por usted. No escriba argumentos legales ni cite precedentes ni estatutos.

The plaintiff wants compensation for all the
damages infringed to all the intellectual
properties, Copyrighted works ©, patents and all
information of the trade secrets. Because the
infringement was willful from the part of
the defendants. All the trade secrets, Copyrighted
works, patents and intellectual properties where
acquired through improper means and
wrongfully taken by the defendants when
(continue on next page) →
V Request for Relief Page #2

I declare under penalty of perjury that the foregoing is true and correct.
Declaro bajo pena de perjurio que lo anterior es cierto y correcto.

Signed this 13 day of March of 2024.
(día) (mes) (año)


Plaintiff's signature
Firma del demandante

Part IV Page 2.
Statement of Claim

damages of consideration, beyond repair to the plaintiff intellectual properties, patents, copyrighted works registered by the plaintiff. In which the plaintiff is its editor, director and developer. The copyrights registered numbers as well as ISBN of the works will be send to this Honorable court by the plaintiff when the institution of Ponce 1,000 adults lift the quarantine of "COVID" in the date of March 28, 2024. The plaintiff will prepare an informative motion with the information.

That motion will include samples, copyrights registration number, ISBN numbers and all works related.

The present case is a subject matter of jurisdiction because there is copyrighted works involved and patents. The 28 U.S. Code § 1338 - Patents plant variety protection, copyright, mask works, designs, trademarks and unfair competition.

(a) The district courts shall have original jurisdiction of any civil action arising under any act of congress relating to patents, plant variety protection, copyrights and trademarks. No state court

Statement of Claim

Shall have jurisdiction over any claim for relief arising under any act of congress relating to patents, plant variety protection, or copyrights. For purposes of this subsection, the term "STATE" includes any state of the united states, the district of Columbia, the Commonwealth of Puerto Rico, the United States Virgin Islands, American Samoa, Guam and the Northern Mariana Islands. 28 US Code § 1338(a) and code § 1367(e). The present case involves patents, copyrighted works and intellectual properties owned, created and registered by the plaintiff here.

The plaintiff here have all the rights reserved over his works and intellectual properties. This dispute is not related to contracts, its related to works owned, created and registered by the plaintiff here. In which the plaintiff here have moral rights granted under copyright law. With the facts of the day of 30 September of 2019, the trade secrets of the plaintiff, information about programs, coding, methods, etc. related to the works that are the subject of efforts that where reasonable under circumstances to

Part IV page 4.

Statement of Claim

maintain its secrecy. which is related to the development of the copyrighted work with the title End Chapter: Master of Maerix, Sonos, web pages coding and other pages coded and created by the plaintiff here. This includes patterns, codes, programming, methods, techniques and a process to develop the title End chapter: Master of Maerix for nintendo, microsoft and Sony as third developer. All the information of the trade secrets was taken by the defendants when they wrongfully sold the plaintiff house and took over all the plaintiff goods (private properties) and community properties owned by the plaintiff and that includes the business with the name of laboratories Clinicos Nazary Inc.

The following is a list of the copyrighted works, patents, intellectual properties and works related owned by the plaintiff.

1. Neimur: The zone of the Gods.
Copyrighted work, © and B
2. Sepherma: The zone of the Gods.

Part IV Page 5

Statement of Claim

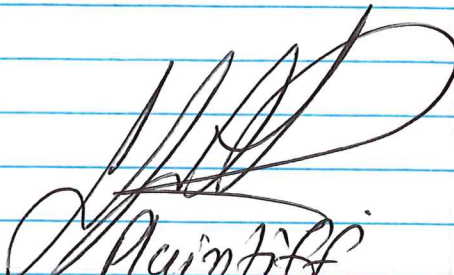
- Copyrighted work, © and ~~ℓ~~
3. End Chapter: Master of Macroix
 - Copyrighted work, ©
 4. The other one
 5. Baron Fire (S)
 6. Coded Material of the web page of wi-Fi Digital Press
 7. Music Material and Coding with programming.

As explained before the plaintiff will provide samples that are at the moment online in Amazon, facebook deviantart, Soundcloud, etc. Here a few profiles that are online with the copyrighted material and works related: 1~deviantart: Masentral and wi-Fi Digital Press, 2~ Amazon: Javier Sama Acevedo and wi-Fi Digital Press 4~ Facebook: Digams Corps, wi-Fi Digital Press and official Javier Sama, 5~ YouTube: acedipa, 6~ Pinterest: Digams, wi-Fi Digital Press, End Chapter: Master of Macroix, Javier Sama 7~ X: Digams Corps, wi-Fi Digital Press, Javier Sama, 8~ Soundcloud: Javier Sama and there are more evidence of the material that the plaintiff will send separated to this Honorable Court in the beginning of the month of April 2024. The plaintiff here is the Honorable court to grant the plaintiff petition to sue the defendants

Part IV Page 6
Statement of Claim

mentioned on this case for the total amount of \$450,000.00 plus expenses and counsel honoraries that incurs the process of this legal case. I thank in advance for paying attention to the plaintiff petition.

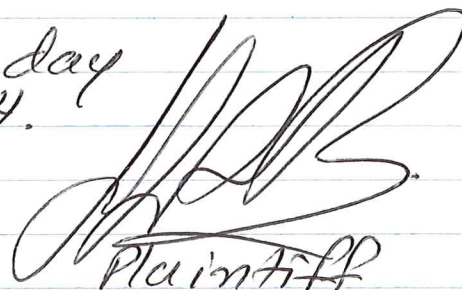
Signed this 13 day
of March of 2024!


Plaintiff
Signature

✓ Request for Relief.
Page # 2

they fraudulently took all the good's (private properties) and the community properties of the plaintiff. The plaintiff knows that all damages to all patents, copyrighted works (registered by the plaintiff) and the intellectual properties are of consideration, beyond repair. In this case the infringement is totally willful and for all the damages for each work willfully infringed and damage, the plaintiff wants to be awarded \$150,000.00 for each work willfully infringed and damage. For a total amount of \$450,000.00

Signed this 13 day
of March of 2024.



Plaintiff
Signature